

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

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TONY T. YARBER *et al.*, )  
Plaintiffs, )  
v. ) No.: 3:16-CV-246-CWR-ASH  
TATE REEVES *et al.*, )  
Defendants. )  
\_\_\_\_\_  
)

**PLAINTIFFS' REPLY REGARDING  
MOTION TO AMEND THE CLASS ACTION COMPLAINT**

Without conceding the accuracy of the Defendants' statements regarding plaintiffs, allegations, or counts that this Court or the Fifth Circuit has ordered to be dismissed, Def. Resp. at 1, and without waiving any rights, the Plaintiffs confirm that their motion to amend does not seek reconsideration of any of this Court's prior orders.

May 16, 2024

Respectfully submitted,

**Mayor Chokwe Antar Lumumba, Mayor of the  
City of Jackson, Mississippi, on behalf of the  
Citizens of the City of Jackson, Mississippi;  
Ashby Foote, Kenneth I. Stokes, Angelique C.  
Lee, Brian C. Grizzell, Vernon W. Hartley Sr.,  
Aaron Banks, and Virgi Lindsay, all in their  
official capacities as elected members of the City  
Council of the City of Jackson, Mississippi, from  
their respective wards**

By: s/ Sheridan Carr  
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**Mayor Chokwe Antar Lumumba, individually as  
a taxpayer and citizen of the City of Jackson,  
Mississippi, on behalf of himself and all others  
similarly situated**

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**Ashby Foote, Kenneth I. Stokes, Angelique C.  
Lee, Brian C. Grizzell, Vernon W. Hartley,  
Aaron Banks, and Virgi Lindsay, individually as  
citizens of the City of Jackson, Mississippi, on  
behalf of themselves and all others similarly  
situated**

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**Jackson Municipal Airport Authority, Board of  
Commissioners of the Jackson Municipal  
Airport Authority, Lucius Wright, Rickey Jones,**

**and Rica Lewis-Payton each in his or her official capacity as a Commissioner on the Board of Commissioners of the Jackson Municipal Airport Authority**

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**Lucius Wright, Rickey Jones, and Rica Lewis-Payton, each individually as members of the Jackson Municipal Airport Authority and as citizens of the City of Jackson, Mississippi, on behalf of themselves and all others similarly situated**

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**CERTIFICATE OF SERVICE**

I, LaToya C. Merritt, certify that the foregoing document has been filed with the Clerk of Court using the Court's ECF system, which provides service of the foregoing to all counsel of record who have entered an appearance in this case as of the date below.

Date: May 16, 2024.

s/ LaToya C. Merritt  
LaToya C. Merritt